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Attorneys for Defendant
EXPERIAN INFORMATION SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NOEMIA CARVALHO,

Plaintiff,

v.

**CREDIT CONSULTING SERVICES, ET
AL.,**

Defendant.

Case No. C 08-01317-JF-HRL

**REQUEST OF DEFENDANT
EXPERIAN INFORMATION
SOLUTIONS, INC. TO APPEAR
TELEPHONICALLY AT HEARING
ON PLAINTIFF'S MOTION TO
REMAND CASE TO STATE COURT;
DECLARATION OF SUZANNE C.
JONES IN SUPPORT THEREOF**

Date: June 20, 2008
Time: 9:00 a.m.
Location: Courtroom 3

Defendant Experian Information Solutions, Inc. ("Experian") respectfully requests permission for Suzanne C. Jones to appear telephonically at the hearing on Plaintiff's Motion to Remand Case to State Court currently set for hearing on June 20, 2008, at 9:00 a.m. before the Honorable Jeremy Fogel.

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1 Good cause exists to grant this request because Ms. Jones would be required to travel
2 from Los Angeles, California to San Jose, California, such that Experian will incur significant
3 travel costs and attorney's fees. Deanna Johnston, an associate in Jones Day's San Francisco
4 office, will attend the hearing in person. Allowing Ms. Jones to appear telephonically would
5 minimize additional costs to Experian. Furthermore, Experian is neither movant nor respondent
6 to the motion. Counsel for Experian believes the objectives of the hearing will be accomplished
7 if Ms. Jones appears by telephone.

8 Dated: June 12, 2008

Respectfully submitted,

9 Jones Day

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11 By: /S/ Suzanne Cate Jones
12 Suzanne Cate Jones

13 Counsel for Defendant
14 EXPERIAN INFORMATION SOLUTIONS,
15 INC.
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DECLARATION OF SUZANNE C. JONES

I, Suzanne C. Jones, hereby declare:

1. I am admitted to practice before this Court and am a partner with Jones Day, counsel for defendant Experian Information Solutions, Inc. ("Experian") in the above-captioned matter. I have personal knowledge of the facts stated herein and if called as a witness, I could and would competently testify thereto.

2. I am located at Jones Day's office in Los Angeles, California. An in-person appearance at the hearing on Plaintiff's Motion to Remand Case to State Court scheduled for June 20, 2008, would require me to travel by plane to San Jose, California and potentially seek accommodations the evening before. Deanna Johnston, an associate in Jones Day's San Francisco office, will attend the hearing in person. Furthermore, Experian is neither movant nor respondent to the motion. Allowing me to appear telephonically would minimize additional costs to Experian.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 12th day of June 2008.

/S/ Suzanne C. Jones

Suzanne C. Jones

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NOEMIA CARVALHO,

Plaintiff,

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**CREDIT CONSULTING SERVICES, ET
AL.,**

Defendant.

Case No. C 08-01317-JF-HRL

**[PROPOSED] ORDER GRANTING
REQUEST OF DEFENDANT
EXPERIAN INFORMATION
SOLUTIONS, INC. TO APPEAR
TELEPHONICALLY AT HEARING
ON PLAINTIFF'S MOTION TO
REMAND CASE TO STATE COURT**

Date: June 20, 2008

Time: 9:00 a.m.

Location: Courtroom 3

1 The Request of Experian Information Solutions, Inc. ("Experian") to Appear
2 Telephonically at the Hearing on Plaintiff's Motion to Remand Case to State Court came before
3 the Honorable Jeremy Fogel of the above-captioned Court on or about June 12, 2008. After
4 considering the Request and good cause appearing,

5 IT IS HEREBY ORDERED that Suzanne C. Jones shall be permitted to appear via
6 telephone at the hearing on the Motion of Plaintiff Noemia Carvalho to Remand Case to State
7 Court currently scheduled for June 20, 2008 at 9:00 a.m.

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9 DATED: _____, 2008

The Honorable Jeremy Fogel
United States District Court Judge

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